

Attachment 1 to Exhibit A

RE: Anderson v. Louvin et al

Agostina Steier <agostina.steier@kennardlaw.com>

Wed 2/21/2024 9:13 AM

To: Douglas Welmaker <doug@welmakerlaw.com>

Cc: Eddie Hodges <eddie.hodges@kennardlaw.com>; Alfonso Kennard <alfonso.kennard@kennardlaw.com>;

Filings@KennardLaw <Filings@KennardLaw.com>

Douglas,

I hope this message finds you well.

We wanted to provide you with an update regarding the Discovery responses for our client. While our client has been diligently working on fulfilling all requirements, the complexity of the task, compounded by the extensive requests and the presence of three Plaintiffs, has posed some challenges.

We are in the final stages of completion but still need to gather a few remaining documents to ensure thorough and accurate responses.

Given the circumstances, we kindly request an extension of 15 days beyond the current deadline of February 29th. This additional time will allow us to finalize the responses and ensure they meet all requirements. The answers will be sent on or before March 15th.

Additionally, we confirm that any objections will be waived upon submission of the responses.

Thank you for your understanding and consideration.

Best regards,

**Agostina Steier** ✓*Case Manager*

[http://]

Kennard Law P.C.*Direct Line: 346.980.8205**Toll Free: 855.kennlaw**Email: agostina.steier@kennardlaw.com*kennardlaw.com**De:** Douglas Welmaker <doug@welmakerlaw.com>**Enviado el:** lunes, 29 de enero de 2024 16:20**Para:** Agostina Steier <agostina.steier@kennardlaw.com>**CC:** Eddie Hodges <eddie.hodges@kennardlaw.com>; Alfonso Kennard <alfonso.kennard@kennardlaw.com>; Filings@KennardLaw <Filings@KennardLaw.com>**Asunto:** Re: Anderson v. Louvin et al

Agostina, I have no problem with providing me responses by February 29, with the understanding that all objections have been waived.

Douglas B. Welmaker

Welmaker Law, PLLC
409 N. Fredonia St., Suite 118
Longview, Texas 75601
(512) 799-2048
<http://www.welmakerlaw.com>

From: Agostina Steier <agostina.steier@kennardlaw.com>
Sent: Monday, January 29, 2024 12:46 PM
To: Douglas Welmaker <doug@welmakerlaw.com>
Cc: Eddie Hodges <eddie.hodges@kennardlaw.com>; Alfonso Kennard <alfonso.kennard@kennardlaw.com>; Filings@KennardLaw <Filings@KennardLaw.com>
Subject: RE: Anderson v. Louvin et al

Hi Doug,

Certainly, we're fully committed to responding to the discovery. We are now actively exchanging information with our clients. Would you be open to granting an extension until February 29th to ensure a comprehensive and complete response?

Additionally, could you please include filings@kennardlaw.com in future communications? This will help us provide a quicker response.

Best regards,

**Agostina Steier** ✓

Case Manager

[<http://>]

Kennard Law P.C.

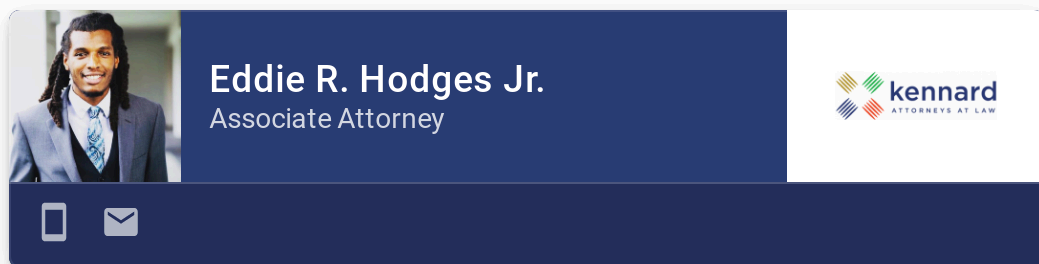
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kennardlaw.com

De: Eddie Hodges <eddie.hodges@kennardlaw.com>
Enviado el: lunes, 29 de enero de 2024 14:06
Para: Agostina Steier <agostina.steier@kennardlaw.com>
Asunto: Fwd: Anderson v. Louvin et al



[Click for my contact details](#)

From: Douglas Welmaker <doug@welmakerlaw.com>
Sent: Monday, January 29, 2024 11:04:17 AM
To: Alfonso Kennard <alfonso.kennard@kennardlaw.com>; Eddie Hodges <eddie.hodges@kennardlaw.com>
Subject: Fw: Anderson v. Louvin et al

Alfonso and Eddie, please let me know if you intend to answer this discovery.

Douglas B. Welmaker

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From: Douglas Welmaker <doug@welmakerlaw.com>
Sent: Friday, January 26, 2024 11:04 AM
To: Alfonso Kennard <alfonso.kennard@kennardlaw.com>; Eddie Hodges <eddie.hodges@kennardlaw.com>
Subject: Fw: Anderson v. Louvin et al

Alfonso and Eddie, please let me know when you expect to have answers to this discovery, as they are overdue. Thanks,

Doug Welmaker

Douglas B. Welmaker

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From: Douglas Welmaker <doug@welmakerlaw.com>
Sent: Friday, December 15, 2023 4:31 PM
To: Alfonso Kennard <alfonso.kennard@kennardlaw.com>; Eddie Hodges <eddie.hodges@kennardlaw.com>
Subject: Anderson v. Louvin et al

Alfonso and Eddie,

Enclosed please find the following discovery to Defendants, in Word and PDF format:

1. Plaintiffs' First Interrogatories to Defendants
2. Plaintiffs' First Requests for Production to Defendants
3. Plaintiff Anderson's Request for Admissions to Defendants
4. Plaintiff Vasquez's Request for Admissions to Defendants
3. Plaintiff Balderas' Request for Admissions to Defendants

Douglas B. Welmaker

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